

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION**

RE: LACHON SMITH)	Case No. 22 B 12180
)	
)	Chapter 13
Debtor(s))	
)	Judge: CAROL A DOYLE

TRUSTEE'S OBJECTION TO CONFIRMATION OF PLAN

COMES NOW Thomas H. Hooper, Chapter 13 Trustee duly appointed to administer the instant case ("Trustee"), and hereby OBJECTS to confirmation of the Chapter 13 plan filed by Debtor(s), in advance of the confirmation hearing set for December 13, 2022 10:30 am, for the following:

Debtor has failed to provide copies to the Trustee of the most recently filed tax returns in accordance with 11 U.S.C. §§ 521(e)(2)(A)(i), and 1325(a)(1).

Debtor has failed to provide copies of 60 days of pay advices and/or other evidence of income in accordance with 11 U.S.C. §§ 521(a)(1)(B), 1325(a)(1).

WHEREFORE, the Trustee prays the Court to enter an Order denying confirmation of the proposed Chapter 13 plan, and for such other and further relief as the Court may deem just and proper. In the alternative, the Trustee requests a hearing on the matter.

Dated: December 08, 2022

/s/ Thomas H. Hooper

Thomas H. Hooper
Chapter 13 Trustee
55 E. Monroe St., Suite 3850
Chicago, IL 60603
(312) 294-5900

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CERTIFICATE OF SERVICE

I, Kelleye Robinson, do hereby certify that I am, and at all times hereinafter mentioned was, more than eighteen (18) years of age; and that on the date indicated herein below, I served copies of the foregoing TRUSTEE'S OBJECTION TO CONFIRMATION OF PLAN by depositing a copy of the same in a postage-paid envelope with the United States Postal Service or by electronic means, as indicated.

DAVID FREYDIN <i>Attorney for Debtor</i>	(via CM/ECF)
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Patrick Layng United States Trustee	(via CM/ECF)
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LACHON SMITH 2145 E 98TH ST CHICAGO, IL 60617 <i>Debtor</i>	(via U.S. Postal Service)
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Dated: December 08, 2022

/s/ Kelleye Robinson

Kelleye Robinson
Office of the Chapter 13 Trustee
55 E. Monroe St., Suite 3850
Chicago, IL 60603
(312) 294-5900